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By ECF

July 31, 2024

The Honorable LaShann DeArcy Hall
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Alex Levin et al.
Criminal Docket No. 21-208 (LDH)

Dear Judge DeArcy Hall:

This letter is respectfully submitted on behalf of defendant, Alex Levin to seek an extension of time to file post-trial motions pursuant to Federal Rules of Criminal Procedure 29 and 33. Rule 29 provides that “[a] defendant may move for a judgment of acquittal, or renew such a motion, within 14 days after a guilty verdict or after the court discharges the jury, whichever is later.” Fed. R. Crim. P. 29(c)(1). Similarly, Rule 33 provides that “[a]ny motion for a new trial grounded on any reason other than newly discovered evidence must be filed within 14 days after the verdict or finding of guilty.” Fed. R. Crim. P. 33(b)(2). Rule 45 allows the Court to extend the 14-day deadlines under Rules 29 and 33 upon a defendant’s motion made, inter alia, “before the originally prescribed or previously extended time expires.” Fed. R. Crim. P. 45(b)(1)(A).

On July 24, 2024, the jury found defendant guilty on both counts of the indictment. Sentencing is set for November 4, 2024.

Defense Counsel requests that the deadline for motions pursuant to Rules 29 and 33 be extended to 45 days from the date of the verdict.

Counsel has conferred with AUSA Lauren A. Bowman on this matter and is authorized to inform the Court that the Government has no objection to the extension of time requested.

Thank you Your Honor.

Respectfully submitted,

Sgd: *Albert Y. Dayan*
Albert Y. Dayan
Attorney at Law

cc. Lauren A. Bowman & Lorena Michelen (By ECF)
Assistant United States Attorneys